

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

EmployBridge, LLC and Employment  
Solutions Management, Inc.,

Plaintiffs,  
vs.  
CIVIL NO. 1:16-cv-00833

Riven Rock Staffing, LLC, et al.,

Defendants.

**PLAINTIFFS' SUPPLEMENTAL DISCLOSURES PURSUANT  
TO FEDERAL RULES OF CIVIL PROCEDURE, RULES 26(a) and 26(e)**

Plaintiffs EmployBridge, LLC, and Employment Solutions Management, Inc. (collectively, “EmployBridge”), by their attorneys, Seyfarth Shaw LLP, disclose the following information pursuant to Federal Rule of Civil Procedure 26(a) and 26(e). EmployBridge reserves the right to further supplement or amend these and other disclosures and identify additional documents and witnesses not currently known or included in this disclosure. The information set forth below is produced without prejudice to EmployBridge’s right to rely on evidence subsequently discovered, or to further amend or supplement its disclosures if necessary. EmployBridge’s Supplemental Disclosures supplement its Initial Disclosures, served September 6, 2016, and which EmployBridge hereby incorporates by reference as if fully restated herein.

EmployBridge makes the following disclosures without waiving claims of attorney-client privilege, attorney work-product doctrine, or any other applicable objection or privilege, including, but not limited to, those that can be asserted by third parties.

### **1. Rules 26(a)(1)(A)(i) & 26(e)**

EmployBridge states that the following entities are likely to have discoverable information that may be used to support EmployBridge's claims in this matter:

- Stephen Sorensen  
4531 Via Esperanza, Santa Barbara, California 93110  
Mr. Sorenson is expected to have knowledge regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC. Mr. Sorensen is further expected to have knowledge about Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.
- Debby Munoz  
2872 Viejas View Place, Alpine, California 91901  
Ms. Munoz is expected to have knowledge regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, and Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.
- Arlita Purser  
9033 Esquon Road, Durham, California 95938  
Ms. Purser is expected to have knowledge regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, and Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.
- Dave Tonick  
Address unknown  
Mr. Tonick is expected to have knowledge regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, and Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.
- Esperer Holdings, Inc.  
Agent for Service of Process:  
Corporate Creations Network Inc.  
1430 Truxtun Ave., 5th Floor  
Bakersfield, California 93301  
Esperer Holdings, Inc., of which Stephen Sorensen is the principal, is expected to have information and documents regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, as well as information and documents regarding Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.

- Butler America, LLC

Agent for Service of Process:

Corporate Creations Network Inc.  
1430 Truxtun Ave., 5th Floor  
Bakersfield, California 93301

Butler America, LLC, is expected to have information and documents regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, as well as information and documents regarding Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.

- Butler America Holdings, Inc.

Agent for Service of Process:

Corporate Creations Network Inc.  
1430 Truxtun Ave., 5th Floor  
Bakersfield, California 93301

Butler America Holdings, Inc., is expected to have information and documents regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, as well as information and documents regarding Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.

- Kenton Group.com, LLC

Agent for Service of Process:

Corporate Creations Network Inc.  
1430 Truxtun Ave., 5th Floor  
Bakersfield, California 93301

Kenton Group.com, LLC, is expected to have information and documents regarding the formation, corporate structure, management, and operations of Riven Rock Staffing, LLC, as well as information and documents regarding Riven Rock's strategy to solicit away from EmployBridge its clients and employees, including which Riven Rock employees were involved those solicitations.

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DATED: November 1, 2016

Respectfully submitted,

/s/ Daniel P. Hart /

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*Attorneys for Plaintiffs*  
**EMPLOYBRIDGE, LLC and**  
**EMPLOYMENT SOLUTIONS**  
**MANAGEMENT, INC.**

**CERTIFICATE OF SERVICE**

I certify that on October 31, 2016, a true and correct copy of the foregoing was served on Defendants via U.S. Mail, with courtesy copy by email, to the following counsel of record:

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DATED: November 1, 2016

SEYFARTH SHAW LLP,

/s/ Daniel P. Hart /

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